

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Technology Transitions Policy Task Force)	GN Docket No. 13-5
)	

REPLY COMMENTS OF INTRADO INC.

Intrado Inc. (Intrado) respectfully submits the following Reply Comments in the above referenced proceeding.

In general, the initial comments submitted to the Commission regarding proposed NG911 trials were supportive of the Commission’s efforts to “answer important technical and policy questions to accelerate the transition.”¹ However, some suggested that the trials were premature due to practical hurdles such as the lack of technical standards² or comprehensive funding models.³ Intrado acknowledges that a full end-state i3 deployment including industry standards for IP ingress to ESInets is not likely to be immediately available and that a funding solution for ubiquitous deployment of NG911 has yet to be identified. And it is not entirely clear how one

¹ *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, Public Notice, DA 13-1016, GN Docket No. 13-5 (rel. May 10, 2013) (“Public Notice”) at 2.

² Comments of AT&T at 8.

³ Comments of Sprint Nextel Corporation at 14.

aspect of i3, a National Forest Guide, will be implemented—in terms of how it will be produced, who will pay for it, and how it will interoperate.⁴

However, components of NG911 are being deployed today, and the Commission's observation of that process—including real-time identification of practical and policy issues that arise from the transition from legacy to NG911 will be beneficial to advancing the movement to NG911. The Commission should conduct NG911 trials that are separate from AT&T's proposal to trial the complete migration of legacy end offices to IP. The NG911 trials would not be temporary experiments, but would entail industry and government observation of, and participation in, actual deployments. The Commission should conduct these trials in a fluid and dynamic manner. It can certainly identify deployments that it will observe today for the value they offer and add new trials or trials of new functionality in the future. As the Bexar Metro 9-1-1 District (Bexar Metro) suggests, there are many real-world, non-technical aspects of NG911 that require scrutiny. For example, in its initial comments, Bexar Metro identified the issue of how participants will address interconnection obligations, notwithstanding whether the traffic is IP or TDM. Bexar Metro stated:

Overarching many of the Commission's questions and these matters is recognizing that in the context of NG9-1-1, a major remaining potential roadblock is not purely technical, operational, or financial. Rather, a major remaining potential roadblock is that the NG9-1-1 legal and regulatory framework for interconnection type transition aspects is uncertain, or at a minimum at least very debatable.⁵

In any event, the ability to observe the implementation of industry standards for IP to ESInet interconnection is not that far off. Since the date on which initial comments were filed in

⁴ NENA proposes that the Forest Guide be part of the trials, testing interoperability with Canada. (Comments of the National Emergency Number Association at 9.) Intrado suggests that the industry needs to begin a dialogue on questions related to a national database before it can be considered to be an assumed part of NG911 deployments and trialed.

⁵ Initial Comments of the Bexar Metro 9-1-1 Network District at 4.

this proceeding, ATIS has approved for publication the relevant standard: ATIS-0700015, “Standard for Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination and ESInet/Legacy Selective Router Termination.” Limited implementation of the standard could be trialed by the end of next year.

Respectfully submitted,

INTRADO INC.

/S/

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